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Attorneys for Plaintiff
MICHAEL SHANE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL SHANE)	Case No.: 2:16-cv-02263-JAD-CWH
)	
Plaintiff,)	STIPULATION TO EXTEND TIME
v.)	TO FILE MOTION FOR REMAND
)	AND/OR REVERSAL
NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security.)	(FIRST REQUEST)
)	
Defendant.)	
)	

Plaintiff Michael Shane ("Plaintiff") and defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant"), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff's Motion for Reversal and/or Remand to March 9, 2017; and that Defendant shall have 30 days or until April 10, 2017, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due May 1, 2017.

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1 This is Plaintiff's first request for an extension. The Administrative Record
2 provided to Plaintiff's counsel is unable to be opened and read. Both parties are
3 working to correct this matter. Counsel sincerely apologizes to the court for any
4 inconvenience this may have had upon it or its staff.

5
6 DATE: January 23, 2017

Respectfully submitted,

7 ROHLFING & KALAGIAN, LLP

8 /s/ *Marc V. Kalagian*

9 BY: _____

Marc V. Kalagian

10 Attorney for plaintiff Mr. Michael Shane

11
12 DATE: January 23, 2017

Daniel G. Bogden

13 United States Attorney

14 /s/ *Roya Massoumi*

15 BY: _____

Roya Massoumi

16 Special Assistant United States Attorney

Attorneys for defendant Carolyn W. Colvin

17 |*authorized by e-mail|

18
19 DATED: January 24, 2017

20 IT IS SO ORDERED: _____

21 UNITED STATES MAGISTRATE JUDGE
22
23
24
25
26

**CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:16-CV-02263-JAD-CWH**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on January 23, 2017.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Marc V. Kalagian

Marc V. Kalagian
Attorneys for Plaintiff